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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

DEANNA L. GEIGER and JANINE M.

NELSON, ROBERT DUEHMIG and

WILLIAM GRIESAR,

Case No: 6:13-cv-01834-MC

Plaintiffs,

v.

JOHN KITZHABER, in his official capacity as Governor of Oregon, ELLEN ROSENBLUM, in her official capacity as Attorney General of Oregon, JENNIFER WOODWARD, in her official capacity as State Registrar, Center for Health Statistics, Oregon Health Authority, and RANDY WALRUFF, in his official capacity as Multnomah County Assessor,

Defendants.

LAKE PERRIGUEY'S
DECLARATION
PLAINTIFFS GEIGER, NELSON,
DUEHMIG & GRIESAR'S
RESPONSE IN OPPOSITION TO
MOTION TO CONSOLIDATE

Case No: 6:13-cv-02256-TC

PAUL RUMMELL and BENJAMIN WEST;

LISA CHICKADONZ and CHRISTINE

TANNER; BASIC RIGHTS EDUCATION

FUND,

Plaintiffs,

v.

JOHN KITZHABER, in his capacity as Governor of Oregon; ELLEN ROSENBLUM,

LAKE PERRIGUEY'S
DECLARATION
PLAINTIFFS GEIGER, NELSON,
DUEHMIG & GRIESAR'S
RESPONSE IN OPPOSITION TO
MOTION TO CONSOLIDATE

in her official capacity as Attorney General of Oregon; JENNIFER WOODWARD, in her official capacity as State Registrar, Center for Health Statistics, Oregon Health Authority, and RANDY WALDRUFF, in his official capacity as Multnomah County Assessor,

Defendants

I, Lake Perriguet, make this declaration in support of Plaintiffs Geiger, Nelson, Duehmig and Griesar's Response in Opposition to Motion to Consolidate.

1. On July 25, 2013, I notified Defendant Rosenblum of my intent to file this case.
2. On August 9, 2013, I learned that a lawyer for Basic Rights Oregon had contacted my legal mentor, inquiring as to whether I was filing this case.
3. On September 10, 2013, I notified Oregon ACLU Litigation Coordinator, Jann Carson, of my intent to file this case.
4. On September 15, 2013, I confirmed my intent to Rummel and Basic Rights Education Fund plaintiffs lawyer, Amanda Goad, of my intent to file this case.
5. On September 23, 2013, I spoke with Basic Rights Oregon Education Fund director, Jeanna Frazzini, about my intent to file this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of January 2013.

By: s/ Lake James H. Perriguet
Lake James H. Perriguet, OSB No. 983213